



Miedel & Mysliwiec LLP

Application GRANTED. The motion deadline and related deadlines are extended by 30 days. The Clerk of Court is directed to terminate Doc. #94. SO ORDERED.

March 26, 2021

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', written over a blue date stamp.

March 26, 2021

Hon. Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Robert Wilson, et. al. (19-CR-625 (JMF))**

Dear Judge Furman,

Motions are due on April 1, 2021, in this case, which is scheduled for trial on January 4, 2022. Writing on behalf of the four defendants, I respectfully request a 30-day extension of the motions deadline. The government consents to this request.

The defendants seek this extension because at least some are engaged in vigorous plea negotiations and discussions with the government that may lead to resolutions for those defendants. The government has made plea offers to at least two of the defendants with expiration dates of April 1 to coincide with the motions deadline, but has agreed to keep the plea offers open if the motions deadline is extended. As the Court is aware, the COVID pandemic has made attorney-client communications exceedingly difficult. Discussions about pleas in serious cases are particularly complex and require significant investments of time with our clients. Some of the attorneys have begun visiting their clients in person in recent weeks as the vaccine has become available and conditions have improved. Others are likely to do so in the coming days. Given the fact that the trial date is still more than eight months away, we believe it is in everyone's interest not to put time pressure on these delicate negotiations. At least some counsel are optimistic that a non-trial resolution can be reached with some additional (in person) time between lawyers and clients.

Since trial is still months away, an extension of the motions deadline will have no impact on the parties' ability to be ready for trial. Accordingly, the defendants jointly respectfully request for the motions deadline to be extended by 30 days. As noted, the government consents.

Respectfully,

/s/

Florian Miedel  
*Attorney for Marquis Yohanis*

cc: All Counsel